



United States Department of the Interior

FISH AND WILDLIFE SERVICE

P.O. Drawer 1190  
Daphne, AL 36526

October 10, 1991

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Mr. Ken Lucas  
Senior Remedial Project Manager  
United States Environmental Protection Agency  
345 Courtland Street Northwest  
Atlanta, Georgia 30356

Dear Mr. Lucas:

This is to confirm Fish and Wildlife Service (Service) comments presented at the October 7, 1991, meeting with Olin Corporation concerning the Revised Sampling and Analytical Plan Macroinvertebrate Study and Fish Sampling dated September 1991.

We support the proposed macroinvertebrate study to assess impacts to the basin resulting from past Olin discharges. However, without an extensive and historic data base from the area it may be difficult to interpret the data, i.e., man induced effects as opposed to natural variations. It was unclear if control stations are to be incorporated into the investigation. Without good historic data from the site, which is probably lacking, these control stations would be a vital tool in data evaluation.

The plan proposes to conduct chemical residue analyses on two species of fish at the top of the food chain. This is the proper protocol for evaluating maximum loading to the food chain as well as potential impacts to the human consumer. However, in order to assess effects to Department of the Interior (Department) trust resources, migratory birds, anadromous fish, etc., it will also be necessary to also sample intermediate level fish species as well as other food organisms such as crawfish, frogs, snakes, worms, etc.

Hoop nets are suggested as a means of collecting fish samples with cheese used as a bait. This cheese should be analyzed for the same parameters as the fish to assure that it is not an additional source of contamination.

In determining contaminant levels in fish, filets will be analyzed separate from the carcass. We recommend that both filets be removed and analyzed together and that the carcass be analyzed as a separate sample. This is opposed to analyzing only one filet and leaving the other with the carcass sample. In this way a clear determination can be made as to residue levels in the edible portion relative to the whole fish.

It was unclear in the study design if the fish would be analyzed separately or as composite samples. Fish samples should be analyzed individually which will provide a range of actual data rather than average values generated by composite samples.

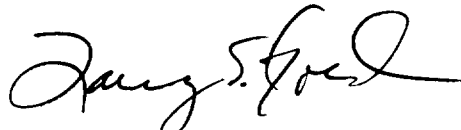
The plan proposes that only 5 of the 20 fish collected for each species be subject to whole body analysis. Our own sampling program has revealed a considerable variation in the mercury uptake rate within the biota, and we believe that in order to obtain a representative data base, all 20 fish carcasses should be analyzed.

We note that Olin continues to eliminate the adjacent Tombigbee River as part of the biological sampling scheme. It has been and continues to be the firm position of the Service that there is an overwhelming justification for the inclusion of the river into the sampling program. The evaluation of the Service and Department position regarding a "covenant not to sue" cannot be completed until this area has been investigated.

The Department has entrusted unto the Service the responsibility for determining if damages may have occurred to its trust resources as the result of activities from Olin Corporation activities at the McIntosh site. These proposed amendments to the study plan are necessary for us to conduct this determination. Please advise if you determine not to incorporate them into the study plan.

In order to promote communication and assist in expediting the process we offer to work directly with the project consultant in developing a study that addresses our requirements.

Sincerely,



Larry E. Goldman  
Field Supervisor

cc: Jim Lee, FWS, Atlanta, GA  
Don Schultz, FWS, Atlanta, GA